

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE INTERCEPT MEDIA, INC.,

Plaintiff,

v.

OPENAI, INC., OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI
HOLDINGS, LLC, and MICROSOFT
CORPORATION

Defendants.

Civil Action No. 1:24-cv-01515-JSR

**DECLARATION OF THOMAS
KAYES IN SUPPORT OF
MOTION FOR ADMISSION *PRO
HAC VICE***

I, Thomas Kayes, declare as follows:

1. Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern District of New York, I respectfully submit this Declaration in support of my motion for an Order for admission to practice *pro hac vice* to appear as counsel for The Intercept Media, Inc. in the above-captioned action.

2. I am a member in good standing of the bar of the State of Illinois. Attached as Exhibit A is a true and correct copy of the Certificate of my Good Standing from the Supreme Court of Illinois.

3. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court, and there are no disciplinary proceedings presently against me.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on June 20, 2024

Chicago, Illinois

/s/ Thomas Kayes

Thomas Kayes